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Rupaco T. González, Jr.
Attorney & Counselor at Law

July 12, 2000

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JUL 12 2000
FCC MAIL ROOM

Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
445 12th Street, TW-A325, S.W.
Washington, D.C. 20554

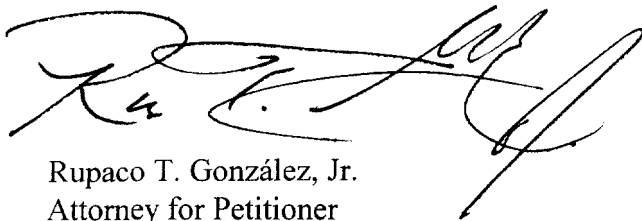
RE: CC Docket No. 94-102, Emergency Petition for FCC Compliance Oversight and Conditional Petition for Maximum Sanctions

Dear Ms. Salas:

Attached are an original and eleven copies of a pleading on behalf of the Texas Commission on State Emergency Communications. Please file and distribute the original and ten copies in accordance with the appropriate procedures, including distributing copies to the FCC Chairman and each of the other FCC Commissioners. Please also file stamp the extra copy and return it to me in the enclosed self-addressed stamped envelope.

Your assistance in this matter is much appreciated.

Very truly yours,



Rupaco T. González, Jr.
Attorney for Petitioner

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

JUL 12 2000

FCC MAIL ROOM
CC Docket No. 94-102

In the Matter of)
)
Emergency Petition of the Texas Commission on)
State Emergency Communications for FCC)
Compliance Oversight Regarding the Six-Month)
Deadline for Implementation of Wireless E9-1-1)
Phase I Service And Conditional Petition for)
Maximum Sanctions Against Carriers for)
Violations of the FCC's Wireless E9-1-1 Rules)
Related to those Wireless Carriers Not)
Operational by August 31, 2000)

To: The Federal Communications Commission

**TEXAS COMMISSION ON STATE EMERGENCY COMMUNICATIONS' EMERGENCY
PETITION FOR FCC COMPLIANCE OVERSIGHT AND CONDITIONAL PETITION FOR
MAXIMUM SANCTIONS**

The Texas Commission on State Emergency Communications ("TX-CSEC") files this emergency petition for FCC compliance oversight regarding the implementation of wireless E9-1-1 Phase I service and conditional petition for the maximum sanctions permitted by the FCC's authority against the specific wireless carriers (or the Incumbent Local Exchange Companies, as appropriate) noted herein for violations of the FCC's wireless E9-1-1 Phase I service rules related to carriers that do not have wireless E9-1-1 Phase I service operational by August 31, 2000. The FCC has previously indicated that 9-1-1 Agencies could file complaints against carriers and utilize accelerated procedures to obtain compliance with the FCC's wireless

E9-1-1 Phase I service rules.¹ In support of its emergency petition and conditional petition, TX-CSEC would respectfully show as follows:

I.

The Texas Legislature has mandated that TX-CSEC implement wireless E9-1-1 Phase I service in compliance with the FCC Order in CC Docket No. 94-102 for at least seventy-five of TX-CSEC program area by August 31, 2000 or face the loss of several million dollars that would otherwise be available to provide 9-1-1 service.² Immediately following that August 31, 2000 deadline, the Texas State Auditor must conduct an audit of whether TX-CSEC was successful in getting wireless E9-1-1 operational in seventy-five percent those program areas.

Between October 11, 1999 and February 10, 2000, TX-CSEC officially requested the implementation of wireless E9-1-1 Phase I service from wireless carriers covered by the FCC's wireless E9-1-1 rules providing service within TX-CSEC program areas.³ In addition to

¹ Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Second Memorandum Opinion and Order, FCC 99-352, released Dec. 8, 1999, (*E911 Second Reconsideration Order*) at Paragraph 55. The FCC stated:

We seek to ensure the prompt compliance of carriers with valid requests for service from PSAPs as a result of the actions undertaken in this Order. We intend to address any complaints expeditiously to ensure that implementation of important E911 services will not be delayed. Id.

² Appendix A to this petition contains the Texas Legislature's appropriation mandate to TX-CSEC. The specific language is contained in Paragraph 3.

³ Implementation of wireless E9-1-1 Phase I service has been requested from the following wireless carriers covered by the FCC's wireless E9-1-1 rules: (1) Aerial Communications, (2) Alltel Communications, Inc., (3) AT&T Wireless Services, Inc., (4) Caprock Cellular, (5) Cellular One of Central Texas dba Lone Star Cellular, Inc., (6) Centennial Communications, (7) Century Cellunet of Southwest Arkansas Cellular, LP dba Century Cellunet, (8) CGKC&H Rural Cellular LP #2, (9) CT Cube, Inc., (10) Dobson Cellular Systems, (11) GTE Wireless, (12) Houston Cellular, (13) Lamar County Cellular, Inc., (14) Louisiana Unwired LLC, (15) Mid-Tex Cellular Ltd., (16) Nextel Communications, Inc., (17) Plateau Wireless, (18) PrimeCo Personal Communications, LP, (19) SOL Communications, (20) STPCS Joint Venture, South No. 5 RSA, LP dba Brazos Cellular Communications Ltd, (21) Southwestern Bell Wireless, Inc., (22) Sprint Spectrum LP, (23) Texas RSA 1, LP dba XIT Cellular, (24) Texas RSA 15B2 LP dba Five Star

requesting wireless E9-1-1 Phase I service from each of these wireless carriers, TX-CSEC has (1) developed a model wireless E9-1-1 Phase I contract for Texas with wireless industry and local government input to facilitate wireless E9-1-1 Phase I service implementation⁴; (2) held meetings or teleconferences with almost each of these wireless carriers and Southwestern Bell Telephone Company and GTE of the Southwest Inc. (the Incumbent Local Exchange Companies [“ILECs”] providing 9-1-1 network services in the TX-CSEC program areas) to facilitate cooperation between these wireless and wireline carriers for purposes of successful wireless E9-1-1 Phase I service deployment; (3) supported or obtained interim ILEC tariff approvals from the Public Utility Commission of Texas for purposes of removing that lack of approved ILEC tariffs as an impediment to wireless E9-1-1 Phase I service deployment; and (4) assigned several TX-CSEC staff members to work with the wireless carriers and the ILECs to track deployment progress and resolve implementation issues as they may arise.⁵ Notwithstanding all these efforts

Cellular, (25) Texas RSA 3, LP dba Plateau Wireless, (26) Texas RSA 7B3 dba Peoples Cellular, (27) Texas Unwired, (28) United States Cellular, (29) Voice Stream Wireless, (30) Western Wireless, and (31) Wes-Tex Telecommunications, Inc. All of these official request letters are attached to this pleading as Appendix B. The six-month deadline in the FCC’s wireless E9-1-1 rules has passed for all of these wireless carriers except for two carriers whose compliance dates fall in late July and one carrier whose compliance date falls in mid-August.

⁴ In Texas, pursuant to Texas Health and Safety Code Ann. Section 771.0711(g), wireless carriers are entitled to reimbursement for reasonable expenses for network facilities associated with implementing wireless E9-1-1 Phase I service.

⁵ One such implementation issue between the wireless carriers and the ILECs has been the availability of the same 9-1-1 trunking that these ILECs use for themselves and other ILECs when that 9-1-1 trunking crosses a LATA boundary. In a separate petition, TX-CSEC will seek official FCC clarification that the prior InterLATA waivers granted for 9-1-1 trunking are not limited only to the particular ILEC or other ILECs using that 9-1-1 network for wireline E9-1-1 service, but rather, those waivers also apply to 9-1-1 trunking for wireless carriers implementing wireless E9-1-1 Phase I service.

by TX-CSEC, only one wireless carrier in TX-CSEC program areas has wireless E9-1-1 service operational as of the date of the filing of this pleading.⁶

The FCC's Rule 20.18(g) provides that "*within six months of a request* ... licensees subject to this section must provide the telephone number of the originator of a 911 call and the location of the cell site or base station receiving a 911 call from any mobile handset accessing their systems to the designated Public Safety Answering Point through the use of ANI and Pseudo-ANI." (emphasis added) As such, aside from the few exceptions already noted, all of the wireless carriers included in Appendix B of this pleading have not met the six-month deadline in the FCC wireless E9-1-1 rules. While the six-month deadline in the FCC rules has passed for almost all of these wireless carriers, TX-CSEC's objective is to get the wireless E9-1-1 Phase I service operational and not to seek sanctions against wireless carriers. TX-CSEC does not wish to distract these wireless carriers from working to have wireless E9-1-1 Phase I service operation by August 31, 2000 or give them any additional excuses for diverting their efforts away from making wireless E9-1-1 service operational by August 31, 2000. Therefore, TX-CSEC at this time does not seek that the FCC to impose sanctions against wireless carriers, but rather, TX-CSEC requests FCC compliance oversight (perhaps through FCC Staff intervention) related to the FCC's wireless E9-1-1 rules to get wireless E9-1-1 Phase I service operational as soon as possible but no later than the August 31, 2000 deadline mandated by the Texas Legislature.

TX-CSEC hopes that FCC compliance oversight will result in all wireless carriers within the TX-CSEC program areas being operational by the August 31, 2000 deadline mandated by the

⁶ Houston Cellular is currently operational in the TX-CSEC program area administered by the Houston-Galveston Council of Governments. It appears as if in some cases, the delays in implementing the wireless E9-1-1 Phase I service involve delays associated with the SWBT and GTE ordering processes for the dedicated E9-1-1 trunks needed for interconnection to the ILEC 9-1-1 networks.

Texas Legislature. If that occurs, then TX-CSEC does not seek any FCC sanctions related to non-compliance with the six-month deadline in the FCC wireless E9-1-1 Phase I service rules. However, if that does not occur for any wireless carrier by August 31, 2000, then TX-CSEC respectfully requests that the FCC impose the maximum sanctions permitted by the FCC's authority against each particular non-compliant carrier for violations of the wireless E9-1-1 Phase I service rules.⁷

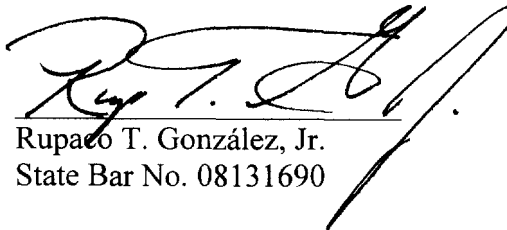
II.

CONCLUSION

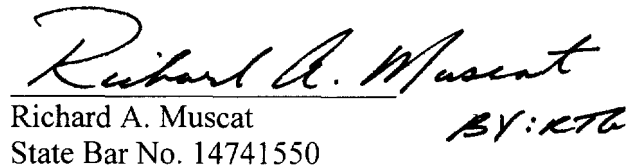
TX-CSEC respectfully requests emergency FCC oversight to facilitate wireless carrier compliance with the six-month deadline in the FCC's wireless E9-1-1 Phase I service rules and the August 31, 2000 appropriation deadline mandated by the Texas Legislature. TX-CSEC hopes that this FCC compliance oversight will result in all wireless carriers within the TX-CSEC program areas Texas being operational by August 31, 2000. If that does not occur for any wireless carrier by August 31, 2000, then TX-CSEC respectfully request that the FCC impose the maximum sanctions permitted by its authority against each of those wireless carriers (and as may be appropriate against an ILEC) for violations of the FCC's wireless E9-1-1 Phase I service rules.

⁷ As mentioned earlier, a wireless carrier's non-compliance may involve delays associated with the SWBT or GTE ordering processes for the dedicated E9-1-1 trunks needed for interconnection to the ILEC 9-1-1 networks. If that is determined to be the case, then TX-CSEC requests the maximum sanctions permitted by the FCC's authority against that particular ILEC. Regarding the ILECs' interconnection responsibilities for wireless E9-1-1 service, the FCC has stated that "[w]e see no reason why such matters cannot be resolved within the timetable adopted by the Commission for the implementation of Phase I and Phase II." *E911 Second Reconsideration Order* at Paragraph 103. Additionally, for non-compliance that is determined to be caused by an ILEC, TX-CSEC will also seek from the Public Utility Commission of Texas the maximum sanctions permitted by its authority under Texas law.

Respectfully submitted,



Rupaco T. González, Jr.
State Bar No. 08131690

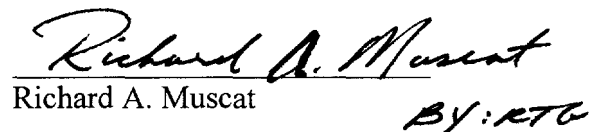


Richard A. Muscat
State Bar No. 14741550

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1705 South Capital of Texas Highway, Suite 100
Austin, TX 78746
(512) 330-9696
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pacolaw@msn.com

Certificate of Service

I certify that a copy of this pleading is being served on or before July 11, 2000 by regular or overnight mail, fax or via e-mail on the Commission Secretary and each of the wireless carriers listed in Appendix B of this pleading, on counsel for Southwestern Bell Telephone Company and GTE of the Southwest, Inc., on counsel of the Cellular Telecommunications Industry Association, and on the Chairman and Commissioners of the Public Utility Commission of Texas.



Richard A. Muscat

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ATTACHMENT A

ADVISORY COMMISSION ON STATE EMERGENCY COMMUNICATIONS
(Continued)

Grand Total, ADVISORY COMMISSION ON STATE EMERGENCY COMMUNICATIONS	\$ 14,102,336	\$ 14,107,336
Number of Full-time Equivalent Positions (FTE)	20.0	20.0
Number of FTEs in Riders	5.0	5.0
Schedule of Exempt Positions and Per Diem of Commission Members		
Executive Director, Group 2	\$69,638	\$69,638
Per Diem of Commission Members	4,300	4,300

1. Sunset Contingency. Funds appropriated above for fiscal year 2001 for the Advisory Commission on State Emergency Communications are made contingent on the continuation of the Advisory Commission on State Emergency Communications by the Legislature. In the event the agency is not continued, the funds appropriated for fiscal year 2000 or as much thereof as may be necessary are to be used to provide for the phase out of agency operations.
2. Appropriation, 9-1-1 Services Fee Account. Contingent on the enactment of House Bill 1983 or similar legislation by the Seventy-sixth Legislature, Regular Session, funds from the 9-1-1 Services Fees Account, not to exceed, \$29,830,000 in Fiscal Year 2000, and \$28,795,000 in Fiscal Year 2001 are hereby appropriated to Strategy A.1.1., 9-1-1 Emergency Communications for the purpose of contracting with the regional councils of government for 9-1-1 services.

It is the intent of the Legislature that the regional councils of government spend all unexpended balances in emergency service fees for landline and wireless telecommunication services accumulated prior to August 31, 1999, and held in accounts outside the State Treasury, estimated to be \$14,696,289, before expending any emergency service fees distributed by the Advisory Commission on State Emergency Communications from the 9-1-1 Service Fees Account for 9-1-1 service contracts. Of the estimated service fee balances, an amount not to exceed \$11,421,622, shall be used for implementation of wireless 9-1-1 services.

3. Unexpended Balances, 9-1-1 Equalization Surcharge. Contingent on the enactment of House Bill 1983 or similar legislation by the Seventh-sixth Legislature, Regular Session, in addition to amounts appropriated above in Strategy A.1.1., 9-1-1 Emergency Communications, the Commission is hereby reappropriated out of the unexpended balances in 9-1-1 equalization surcharge revenue as of August 31, 1999, an amount not to exceed \$2,388,088, to implement Phase I of the wireless 9-1-1 enhancements set forth in FCC Docket 94-102. The Commission is authorized to use these funds to purchase and/or upgrade equipment, and, to make payments to telecommunication providers for contracts to implement wireless enhancements. The Commission is authorized to use no more than 30 percent of these funds for shared costs between landline and wireless 9-1-1 services. None of these funds may be used to provide additional full or part-time positions, nor for any other administrative costs.

The Commission is authorized, with review and approval by the Legislative Budget Board and the Governor to develop a definition that measures completion of Phase I of the wireless 9-1-1 enhancements for at least 75 percent of the population served by the statewide 9-1-1 system. Immediately following one year of the effective date of H.B. 1983, the State Auditor, and any outside consultant the State Auditor may require for assistance, shall conduct an audit to certify whether or not the Commission successfully completed Phase I wireless 9-1-1 enhancements for at least 75 percent of the population served within the allowable time period.

If the State Auditor finds that Phase I of the 9-1-1 wireless enhancements set forth in FCC Docket 94-102 are not in place for at least 75 percent of the population of the statewide 9-1-1 system within one year of the effective date of H.B. 1983, within 45 days after the end of FY2000, the State Auditor shall so certify to the Comptroller of Public Accounts, and the Comptroller shall ensure that none of the remaining unexpended balances from these funds as of August 31, 2000 are expended by the Commission.

The Commission shall report to the Legislative Budget Board and the Governor regarding the progress made toward implementation of Phase I of the wireless 9-1-1 enhancements on or before March 1, 2000, and again on or before September 1, 2000. These reports shall include, but not be limited to: information regarding the total population provided 9-1-1 service by the statewide system; the number and percentage of the population of the statewide system provided with call back and minimal location information for wireless calls; and, information regarding the cost, performance, efficiency and degree of implementation of wireless 9-1-1 services in each regional council of government's service area.

4. Contingency Appropriation for House Bill 1983. Contingent on the enactment of House Bill 1983 or similar legislation by the Seventh-sixth Legislature, Regular Session, in addition to amounts appropriated above in Strategy A.1.1., 9-1-1 Emergency Communications, \$238,246 in fiscal year 2000 and \$210,996 in fiscal year 2001 is hereby appropriated to the Advisory Commission on State Emergency Communications from General Revenue Dedicated Account No. 5007, and the number of full-time equivalent positions listed above are increased by 5 each fiscal year, contingent upon the Comptroller of Public Accounts certifying that the revenue gains to General Revenue Dedicated Account No. 5007 resulting from passage of the legislation are sufficient to fund the amounts hereby appropriated. The purpose of this appropriation is to: administer standardized contracts for 9-1-1 services with regional councils of government; require them to report financial data on administrative costs, efficiency and performance data on public safety answering points, and the status of the implementation of 9-1-1 services; and, comply with other administrative activities identified in the legislation.

ATTACHMENT B



Commission on State Emergency Communications

CERTIFIED MAIL

February 9, 2000

Ms. Zabetta Furlough-Patche
Fixed Network Planning Manager
Aerial Communications
2 Greenway Plaza, Suite 1100
Houston, TX 77046

RE: REQUEST FOR PHASE I WIRELESS E9-1-1 SERVICE

Dear Ms. Furlough-Patche:

On behalf of the Commission on State Emergency Communications (CSEC), thank you for your response to request for wireless carrier information. Please know that we appreciate your company's participation in our efforts to implement Phase I Wireless E9-1-1 service in accordance with FCC rules.

As authorized in Texas Health and Safety Code, Chapter 771.051, the CSEC is the state's authority on emergency communications, and is responsible for the oversight and implementation of 9-1-1 service throughout the state's 9-1-1 program area. The state program is implemented through a partnership with the state's twenty-four Regional Planning Councils (RPCs). As described in Health and Safety Code, Chapter 771, the CSEC is the oversight and funding agency for the 9-1-1 programs administered by the RPCs. Acting in this capacity, the CSEC is directly placing the orders for Phase I Wireless E9-1-1 service on behalf of all of the RPCs of Texas. This letter serves as the CSEC's formal request for your company for that service. We request that you provide written acknowledgement of this request upon your receipt of this letter as a matter of public record.

The CSEC requests that Phase I Wireless E9-1-1 service be fully implemented in the following Regional Planning Councils (RPCs), or Councils of Governments (COGs), and related counties no later than August 15, 2000.



- Brazos Valley Council of Governments
Grimes County
Washington County
- Capital Area Planning Council
Fayette County
- Deep East Texas Council of Governments
Polk County
San Jacinto County
- Golden Crescent Regional Planning Commission
Jackson County
Victoria County
- Houston-Galveston Area Council
Brazoria County
Chambers County
Colorado County
Fort Bend County
Liberty County
Matagorda County
Waller County
Wharton County
- South East Texas Regional Planning Commission
Hardin County
Jefferson County
Orange County

(County Level 9-1-1 Network Diagrams are available on CSEC web site)

We request that you complete the standard Phase I E9-1-1 Service Agreement and Amendment (available on the CSEC web site at www.911.state.tx.us) for each individual COG indicated above. The agreement should be complete, with a detailed cost model and schematic diagrams attached for our review. The completed contract and amendment should be sent to CSEC offices, in duplicate originals, no later than March 1, 2000. The CSEC will coordinate the execution of the contracts with each individual COG, and will subsequently return one of the fully executed originals to your company. We will notify both parties, COGs and Wireless Service Providers, when the contracts are executed.

It is important that each carrier provide the CSEC with a cost model that includes costs by specific components such as trunking, database, SCP functionality, and other related costs. It is incumbent upon the CSEC to review all costs to ensure that we procure services that provide the best value, and avoid cost and service duplication. As you are aware, the CSEC has procured the services of SCC Communications to provide SCP services and wireless database services to the state program at a negotiated contract price. Wireless Service Providers are under no obligation to utilize all of these services. However, since some of these services, specifically the SCP function, may be provided to the Wireless Service Provider by other sources, the CSEC has the responsibility to closely examine all costs to avoid any possible cost duplication and to ensure that the

State program receives the best possible comparative value. A complete and detailed cost model is essential in making this determination.

The CSEC wishes to assist the Wireless Service Providers in facilitating the successful implementation of wireless E9-1-1 service as much as possible. Enclosed you will find information regarding the COGs and Counties in which you have a presence, the PSAP name, Network Provider, as well as Selective Router name and type, to assist you in planning your wireless implementation. In order that we may further assist you in this matter, please provide the CSEC with a written list of any needed information with your contract submission. The CSEC will make every effort to expedite these requests to provide the information to you as soon as possible.

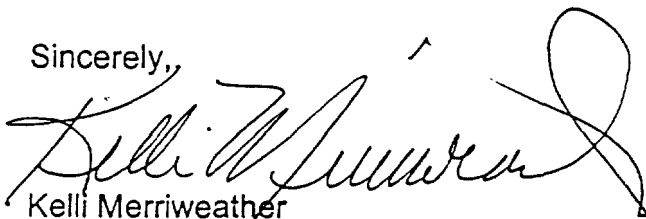
The CSEC encourages you to begin all necessary activities immediately in order for your company to deploy Phase I service by the above noted implementation due date. As the CSEC's 9-1-1 database services provider, SCC Communications is providing project management support to the wireless implementation project and will be providing you with information on processes, procedures and data packets for each of the COGs identified in this letter.

In summary, the CSEC requests that you respond to this request through the following correspondence:

- Written acknowledgement of this Phase I request letter, upon receipt
- Phase I E9-1-1 Service Agreement, and Amendment, completed and submitted in duplicate originals, for each Council of Government indicated above, no later than March 1, 2000
- Detailed Cost Model, in conjunction with contract submission, no later than March 1, 2000
- Schematic Diagrams reflecting the connectivity of the WSP's MSCs to the existing 9-1-1 network
- Written request for additional information, in conjunction with contract submission, no later than March 1, 2000

Again, we appreciate your efforts in the implementation of wireless 9-1-1 service in Texas. If you have questions or need further information regarding this request, please you may contact me at 512/305-6938, or email at kelli.merriweather@csec.state.tx.us.

Sincerely,



Kelli Merriweather
Compliance Program Administrator

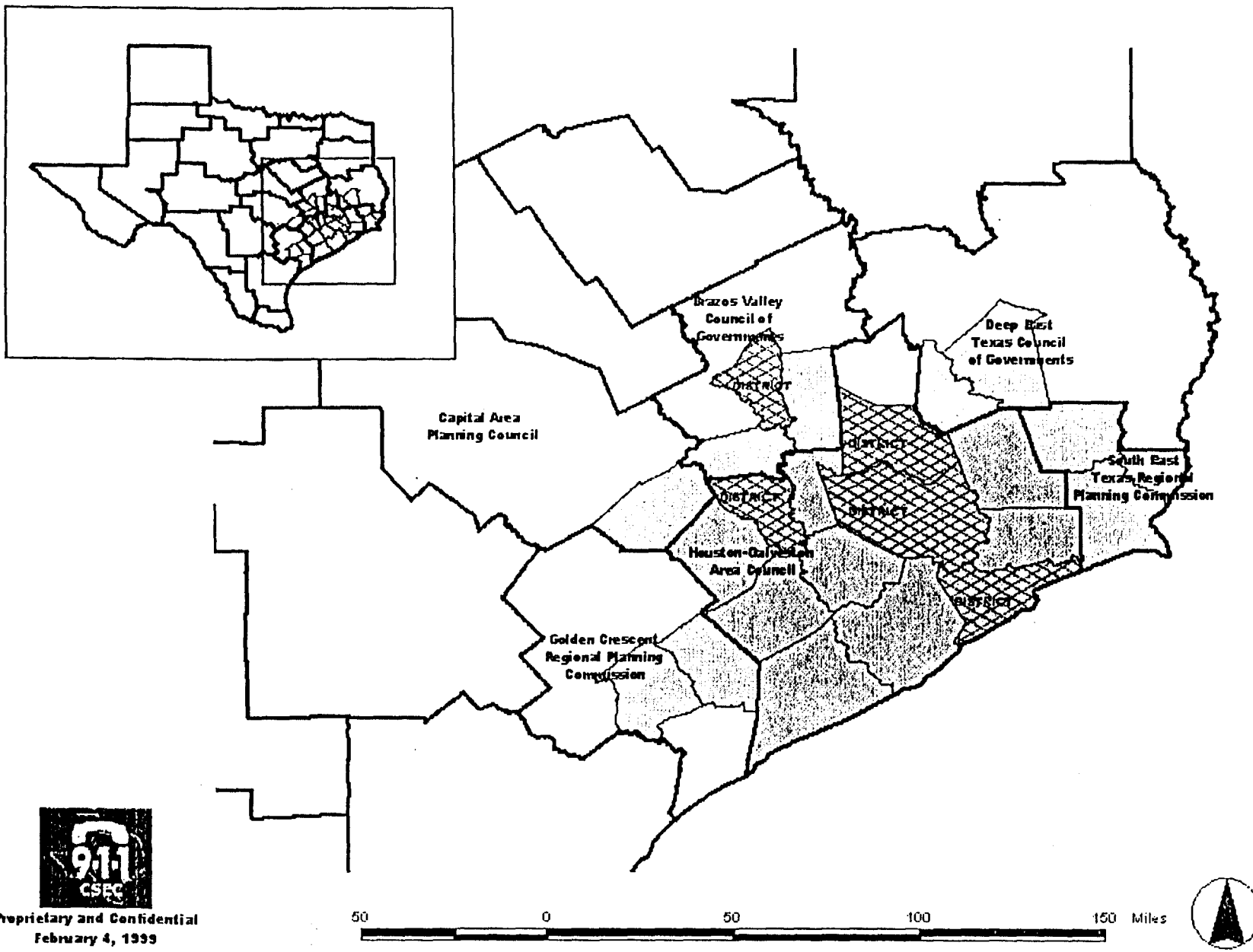
enclosures

CSEC Letter
February 9, 2000

page 4

cc: Latrice Kirkland, Industry Relations/Aerial Communications
James D. Goerke, Executive Director/CSEC
Carey F. Spence, Deputy Director/CSEC
Beth Ozanich, SCC Communications, Inc.
Richard Muscat, Legal Counsel for CSEC
Brazos Valley Council of Governments
Capital Area Planning Council
Deep East Texas Council of Governments
Golden Crescent Regional Planning Commission
Houston-Galveston Area Council
South East Texas Regional Planning Commission

Aerial Operating Co. Counties -- Texas



Texas Wireless Carrier Survey

Report: Individual Carrier Presence by COG/County

Wireless Carrier: Aerial Operating Company

Preferred Solution: CAS

Total Subs: Not Available

Pricing Structure: Not Available

COG	County	PSAP Name	Network Provider	S/R Name	S/R Type
Brazos Valley Council of Governments	BRAZOS	Brazos County Emergency Communications District	N/A	N/A	N/A
	GRIMES	Grimes SO	SWBT	Houston Med Center	5ESS
		Navasota PD	SWBT	Houston Med Center	5ESS
	WASHINGTON	Brenham PD	SWBT	Houston Med Center	5ESS

COG	County	PSAP Name	Network Provider	S/R Name	S/R Type
Capital Area Planning Council	FAYETTE	Fayette SO	SWBT	Austin Evergreen	DMS100
		Fayette SO	GTE	Direct Trunked from Fayette CO	N/A
		Fayette SO	CVTC	Direct Trunked from Hostyn CO	N/A
		Fayette SO	GTE	Direct Trunked from LaGrange CO	N/A
		Fayette SO	GTE	Direct Trunked from Schulenburg CO	N/A
		Fayette SO	SWBT	Houston Med Center	5ESS
		Fayette SO	SWBT	San Antonio Walnut	5ESS
		Fayette SO	SWBT	Victoria rehome to Corpus Christi Tulip on 2/6/00	1AESS to 5ESS on 2/6/00
Deep East Texas Council of Governments	POLK	Polk SO (not enhanced)	SWBT	Houston Oxford rehome to Houston Underwood on 11/16/99	1AESS to 5ESS on 11/16/99
	SAN JACINTO	San Jacinto SO (not enhanced)	SWBT	Houston Oxford rehome to Houston Underwood on 11/16/99	1AESS to 5ESS on 11/16/99
		San Jacinto SO (not enhanced)	SWBT	Houston Med Center	5ESS

COG	County	PSAP Name	Network Provider	S/R Name	S/R Type
Golden Crescent Regional Planning Commission	JACKSON	Jackson SO	SWBT	Victoria rehome to Corpus Christi Tulip on 2/6/00	1AESS to 5ESS on 2/6/00
	VICTORIA	Victoria PD	SWBT	Victoria rehome to Corpus Christi Tulip on 2/6/00	1AESS to 5ESS on 2/6/00
		Victoria SO	SWBT	Victoria rehome to Corpus Christi Tulip on 2/6/00	1AESS to 5ESS on 2/6/00

COG	County	PSAP Name	Network Provider	S/R Name	S/R Type
Houston-Galveston Area Council	AUSTIN	Austin County Emergency Communications District	N/A	N/A	N/A
	BRAZORIA	Alvin PD	SWBT	Houston Med Center	5ESS
		Angleton PD	SWBT	Houston Med Center	5ESS
		Angleton PD	SWBT	Houston Oxford rehome to Houston Underwood on 11/16/99	1AESS to 5ESS on 11/16/99
		Brazoria PD	SWBT	Houston Oxford rehome to Houston Underwood on 11/16/99	1AESS to 5ESS on 11/16/99
		Brazoria SO	SWBT	Houston Med Center	5ESS
		Brazoria SO	SWBT	Houston Oxford rehome to Houston Underwood on 11/16/99	1AESS to 5ESS on 11/16/99
		Clute PD	SWBT	Houston Oxford rehome to Houston Underwood on 11/16/99	1AESS to 5ESS on 11/16/99
		Freeport PD	SWBT	Houston Oxford rehome to Houston Underwood on 11/16/99	1AESS to 5ESS on 11/16/99

COG	County	PSAP Name	Network Provider	S/R Name	S/R Type
		Lake Jackson PD	SWBT	Houston Oxford rehome to Houston Underwood on 11/16/99	1AESS to 5ESS on 11/16/99
		West Columbia PD	SWBT	Houston Med Center	5ESS
		West Columbia PD	SWBT	Houston Oxford rehome to Houston Underwood on 11/16/99	1AESS to 5ESS on 11/16/99
	CHAMBERS	Chambers SO	SWBT	Beaumont Terminal	1AESS to 5ESS on 11/00
		Chambers SO	SWBT	Houston Med Center	5ESS
		Mont Belvieu PD	SWBT	Beaumont Terminal	1AESS to 5ESS on 11/00
		Mont Belvieu PD	SWBT	Houston Med Center	5ESS
	COLORADO	Colorado SO	SWBT	Houston Med Center	5ESS
		Colorado SO	SWBT	Houston Oxford rehome to Houston Underwood on 11/16/99	1AESS to 5ESS on 11/16/99
		Colorado SO	SWBT	Victoria rehome to Corpus Christi Tulip on 2/6/00	1AESS to 5ESS on 2/6/00

COG	County	PSAP Name	Network Provider	S/R Name	S/R Type
	FORT BEND	Fort Bend County EMS	SWBT	Houston Med Center	5ESS
		Fort Bend SO	SWBT	Houston Med Center	5ESS
		Richmond PD	SWBT	Houston Med Center	5ESS
		Rosenburg PD	SWBT	Houston Med Center	5ESS
	GALVESTON	Galveston County Emergency	SWBT	Houston Med Center	5ESS
	HAIRIS	Hairston County Emergency	SWBT	Houston Med Center	5ESS
	LIBERTY	Cleveland PD	SWBT	Houston Med Center	5ESS
		Dayton PD	SWBT	Houston Med Center	5ESS
		Liberty PD	SWBT	Houston Med Center	5ESS
		Liberty SO	SWBT	Beaumont Terminal	1AESS to 5ESS on 11/00
		Liberty SO	SWBT	Houston Med Center	5ESS

COG	County	PSAP Name	Network Provider	S/R Name	S/R Type
	MATAGORDA	Bay City PD	SWBT	Houston Oxford rehome to Houston Underwood on 11/16/99	1AESS to 5ESS on 11/16/99
		Matagorda SO	SWBT	Houston Oxford rehome to Houston Underwood on 11/16/99	1AESS to 5ESS on 11/16/99
		Matagorda SO	SWBT	Victoria rehome to Corpus Christi Tulip on 2/6/00	1AESS to 5ESS on 2/6/00
	MONTGOMERY	Montgomery County Emergency Communications District	N/A	N/A	N/A
	WALLER	Brookshire PD	SWBT	Houston Med Center	5ESS
		Waller SO	SWBT	Houston Med Center	5ESS

COG	County	PSAP Name	Network Provider	S/R Name	S/R Type
	WHARTON	Wharton PD	SWBT	Houston Med Center	5ESS
		Wharton PD	SWBT	Houston Oxford rehome to Houston Underwood on 11/16/99	1AESS to 5ESS on 11/16/99
		Wharton SO	SWBT	Houston Med Center	5ESS
		Wharton SO	SWBT	Houston Oxford rehome to Houston Underwood on 11/16/99	1AESS to 5ESS on 11/16/99
		El Campo PD	SWBT	Houston Med Center	5ESS
		El Campo PD	SWBT	Houston Oxford rehome to Houston Underwood on 11/16/99	1AESS to 5ESS on 11/16/99

COG	County	PSAP Name	Network Provider	S/R Name	S/R Type
South East Texas Regional Planning Commission	HARDIN	Hardin SO	SWBT	Beaumont Terminal	1AESS to 5ESS on 11/00
		Silsbee PD	SWBT	Beaumont Terminal	1AESS to 5ESS on 11/00
	JEFFERSON	Beaumont FD	SWBT	Beaumont Terminal	1AESS to 5ESS on 11/00
		Beaumont PD	SWBT	Beaumont Terminal	1AESS to 5ESS on 11/00
		Jefferson SO	SWBT	Beaumont Terminal	1AESS to 5ESS on 11/00
		Nederland PD	SWBT	Beaumont Terminal	1AESS to 5ESS on 11/00
		Port Authur PD	SWBT	Beaumont Terminal	1AESS to 5ESS on 11/00
	ORANGE	Bridge City PD	SWBT	Beaumont Terminal	1AESS to 5ESS on 11/00
		Orange PD	SWBT	Beaumont Terminal	1AESS to 5ESS on 11/00
		Orange SO	SWBT	Beaumont Terminal	1AESS to 5ESS on 11/00
		Pinehurst PD	SWBT	Beaumont Terminal	1AESS to 5ESS on 11/00
		Vidor PD	SWBT	Beaumont Terminal	1AESS to 5ESS on 11/00